

Premier Health Partners

One Wyoming Street
Dayton, Ohio 45409

May 20, 2004

Mr. Joseph Dubray, Jr.,
Director, Division of Policy
Planning and Program Development
Office of Federal Contract Compliance Programs

RE: 41 CFR Part 60-1

Dear Mr. Dubray:

I am writing in response to the proposed regulations for the definition of an applicant

- We support the OFCCP and other regulatory agencies in their efforts to collect applicant data.
- It is important to our organization that we mirror the communities that we serve.
- Analyzing applicant data allows us to proactively identify recruitment strategies to increase the diversity of our workforce.
- Applicants should only be considered if they meet the stated qualifications for the position in which they are applying.
- To include those individuals in the applicant pool when they do not meet the basic qualifications for the position inappropriately over inflates the true applicant pool.
- Therefore, we support and are in agreement with the OFCCP's proposed definition as it includes, what we believe is a crucial qualifier: "advertised, basic qualifications", meaning that in the advertised position are qualifications that the individual demonstrates that he or she in fact meets.
- This will better qualify who should be considered an applicant – otherwise, almost everyone who fills out an application for a specific position (even if that person doesn't meet basic qualifications) would be considered an applicant thereby, requiring employers to collect data on that person and report that data (even if never considered for the position).

Sincerely,



William E. Linesch
Vice President
Human Resources & Organizational Effectiveness

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